

**REQUEST FOR WAIVER
OF NAVAJO INDEPENDENT SCHOOL DISTRICT 1**

May 16th, 2018

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Docket No. 02-6
Request for Waiver of Navajo Independent School District 1, BEN: 139880
FY2017, Form 471 #171026092

Dear Ms. Dortch:

On behalf of Navajo Independent School District 1 (Navajo ISD), I am respectfully requesting a waiver of section 54.504(a) of the Commission's rules.

Navajo ISD submitted FCC Form 471 #171026092 for E-rate FY2017 on May 11, 2017. Funding request number 1799097967 was submitted for internet access provided by OneNet.¹ Navajo ISD inadvertently omitted the cost of the leased router, which is \$89 per month. This cost is included as part of OneNet's bid.²

Any of the Commission's rules may be waived if good cause is shown.³ The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.⁴ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁵

As the Commission noted in its *Bishop Perry Order*, the Commission allowed applicants to correct ministerial and clerical errors made on their FCC forms.⁶ Here, this error was of the type that USAC could have corrected had the error been discovered before the funding commitment

¹ See Exhibit 1.

² See Exhibit 2 at page 2.

³ 47 C.F.R. § 1.3.

⁴ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (Northeast Cellular).

⁵ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

⁶ See *Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, et al., Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, FCC 06-54, 21 FCC Rcd 5316, 5326-27 ¶¶ 22-23 (2006) (directing USAC to provide applicants with an opportunity to cure ministerial and clerical errors on the FCC Forms that they submit to USAC).

decision letter was issued.⁷ Unfortunately, however, Navajo ISD did not notice the error until after the FCDL was issued and so USAC no longer has the authority to make the correction.⁸

The applicant is respectfully requesting a waiver in order to increase the pre-discount cost of this FRN by \$89 per month (\$1,068 annually). This will result in a corrected pre-discount annual cost of \$55,228 (\$54,160 approved pre-discount cost plus \$1,068).

We note that the Bureau has granted waiver numerous requests of this type, allowing applicants to correct their ministerial and clerical errors,⁹ and we respectfully request that the Bureau grant this waiver request as well.

Please let us know if you have any questions.

Sincerely,

/s/

Chris Webber
Consultant for Navajo School District
CRW Consulting
918-445-0048
chris@crwconsulting.com

⁷ <http://www.usac.org/sl/applicants/step01/clerical-errors.aspx>

⁸ Navajo ISD had filed an appeal with USAC but it was denied on March 27, 2018. This appeal is being filed within 60 days of that decision.

⁹ *Requests for Review of Decisions of the Universal Service Administrator by Archer Public Library et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 23 FCC Rcd 15518 (Wireline Comp. Bur. 2008); *Requests for Waiver and Review of Decisions of the Universal Service Administrator by Ann Arbor Public Schools et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 25 FCC Rcd 17319 (Wireline Comp. Bur. 2010); *Request for Waiver and Review of Decisions of the Universal Service Administrator by Erie I BOCES et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 28 FCC Rcd 13381 (Wireline Comp. Bur. 2013) (Erie I BOCES Order) (granting appeals and petitions for reconsideration from petitioners seeking a waiver of the Commission's E-rate rules in order to correct ministerial or clerical errors on petitioners' E-rate applications or associated forms).

Exhibit 1



Description of Services Ordered and Certification Form 471

FCC Form 471

Application Information

Nickname	Navajo Y20	Application Number	171026092
Funding Year	2017	Category of Service	Category 1

Billed Entity

NAVAJO INDEP SCHOOL DISTRICT 1
15695 S CR 210 ALTUS OK 73521 - 8410
580-482-7742

Contact Information

Kimberly Phillips
918-445-0048
kimberly@crwconsulting.com

Billed Entity Number	139880
FCC Registration Number	0012680237
Applicant Type	School District

Consulting Firms

Name	Consultant Registration Number	City	State	Zip Code	Phone Number	Email
CRW Consulting	16024800	Tulsa	OK	74170	918-445-0048	info@crwconsulting.com

Entity Information

School District Entity - Details

BEN	Name	Urban/ Rural	State LEA ID	State School ID	NCES Code	School District Attributes	Endowment
139880	NAVAJO INDEP SCHOOL DISTRICT 1	Rural				Public School District	None

Related Entity Information

Related Child School Entity - Details

BEN	Name	Urban/ Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
84054	NAVAJO HIGH SCHOOL	Rural				None	Public School	None
84055	NAVAJO ELEMENTARY SCHOOL	Rural				None	Pre-K; Public School	None
16021237	NAVAJO JUNIOR HIGH SCHOOL	Rural				None	Public School	None

Related Child School Entity - Discount Rate Calculation Details

BEN	Name	Urban/ Rural	Number of Students	Students Count Based on Estimate	CEP Percentage
84054	NAVAJO HIGH SCHOOL	Rural	98	N/A	
84055	NAVAJO ELEMENTARY SCHOOL	Rural	290	N/A	
16021237	NAVAJO JUNIOR HIGH SCHOOL	Rural	115	N/A	

Discount Rate

School District Enrollment	School District NSLP Count	School District NSLP Percentage	School District Urban/ Rural Status	Category One Discount Rate	Category Two Discount Rate	Voice Discount Rate
503	216	43.0%	Rural	70%	70%	10%

Funding Request for FRN #1799055462

Funding Request Nickname: 200MB IA with router

Service Type: Data Transmission and/or Internet Access

Agreement Information - Month-to-Month

Establishing FCC Form 470 170059377

Account Number NA

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes

Service Provider OneNet (Oklahoma State Regents) (SPN: 143015254)

How many bids were received for this contract? 1

When will the services end? June 30, 2018

What is the service start date? July 01, 2017

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative 200MB Internet access with router

Line Item # 1799055462.001

Product and Service Details

Purpose	Internet access service that includes a connection from any applicant site directly to the Internet Service Provider		
Function	Fiber		
Type of Connection	Ethernet		
Bandwidth Speed			
Upload Speed	200.0 Mbps	Download Speed	200.0 Mbps

Connection Information

Does this include firewall services?	No	Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a “Wide area network”)?	No
Is this a direct connection to a single school, library or a NIF for Internet access?	Yes		

Cost Calculation for FRN Line Item # 1799055462.001

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$2,669.00	One-time Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$2,669.00	One-time Eligible Unit Cost	= \$0.00
Monthly Quantity	x 1	One-time Quantity	x 0
Total Monthly Eligible Recurring Costs	= \$2,669.00	Total Eligible One-time Costs	= \$0.00
Months of Service	x 12	Summary	
Total Eligible Recurring Costs	= \$32,028.00	Total Eligible Recurring Costs	\$32,028.00
		Total Eligible One-time Costs	+ \$0.00
		Pre-Discout Extended Eligible Line Item Cost	= \$32,028.00

Recipients of Services

BEN	Name
84054	NAVAJO HIGH SCHOOL
84055	NAVAJO ELEMENTARY SCHOOL
16021237	NAVAJO JUNIOR HIGH SCHOOL

FRN Calculation for FRN #1799055462

Monthly Charges	
Total Monthly Recurring Charges	\$2,669.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$2,669.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$32,028.00

One-Time Charges	
Total One-Time Charges	\$0.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$0.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$32,028.00
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$32,028.00
Discount Rate	70%
Funding Commitment Request	= \$22,419.60

Funding Request for FRN #1799055469

Funding Request Nickname: Local Phone

Service Type: Voice

Agreement Information - Contract

Contract Number	NA	Account Number	NA
Establishing FCC Form 470	170059377	Service Provider	Southwestern Bell Telephone Company (SPN: 143004662)
Was an FCC Form 470 posted for the product and/or services you are requesting?	Yes	Based on State Master Contract?	No
Award Date	April 18, 2017	Based on a multiple award schedule?	No
How many bids were received for this contract?	1	Includes Voluntary Extensions?	No
What is the service start date?	July 01, 2017	Remaining Voluntary Extensions	
		Total Remaining Contract Length	
		What is the date your contract expires for the current term of the contract?	June 30, 2018

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative 6 lines local phone services

Line Item # 1799055469.001

Product and Service Details

Function Voice

Type of Connection Local Phone Service Only

Cost Calculation for FRN Line Item # 1799055469.001

Monthly Cost	
Monthly Recurring Unit Cost	\$68.17
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$68.17
Monthly Quantity	x 6
Total Monthly Eligible Recurring Costs	= \$409.02
Months of Service	x 12
Total Eligible Recurring Costs	= \$4,908.24

One-Time Cost	
One-time Unit Cost	\$0.00
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$0.00
One-time Quantity	x 0
Total Eligible One-time Costs	= \$0.00
Summary	
Total Eligible Recurring Costs	\$4,908.24
Total Eligible One-time Costs	+ \$0.00
Pre-Discout Extended Eligible Line Item Cost	= \$4,908.24

Recipients of Services

BEN	Name
84054	NAVAJO HIGH SCHOOL
84055	NAVAJO ELEMENTARY SCHOOL
16021237	NAVAJO JUNIOR HIGH SCHOOL

FRN Calculation for FRN #1799055469

Monthly Charges	
Total Monthly Recurring Charges	\$409.02
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$409.02
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$4,908.24

One-Time Charges	
Total One-Time Charges	\$0.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$0.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$4,908.24
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$4,908.24
Discount Rate	10%
Funding Commitment Request	= \$490.82

[Funding Request for FRN #1799055484](#)

Funding Request Nickname: Long Distance

Service Type: Voice

Agreement Information - Contract

Contract Number	NA	Account Number	NA
Establishing FCC Form 470	170059377	Service Provider	SBC Long Distance, LLC. (SPN: 143008823)
Was an FCC Form 470 posted for the product and/or services you are requesting?	Yes	Based on State Master Contract?	No
Award Date	April 18, 2017	Based on a multiple award schedule?	No
How many bids were received for this contract?	1	Includes Voluntary Extensions?	No
What is the service start date?	July 01, 2017	Remaining Voluntary Extensions	
		Total Remaining Contract Length	
		What is the date your contract expires for the current term of the contract?	June 30, 2019

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative 6 lines long distance services

Line Item # 1799055484.001

Product and Service Details

Function Voice

Type of Connection Long Distance Phone Service Only

Cost Calculation for FRN Line Item # 1799055484.001

Monthly Cost	
Monthly Recurring Unit Cost	\$11.31
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$11.31
Monthly Quantity	x 6
Total Monthly Eligible Recurring Costs	= \$67.86
Months of Service	x 12
Total Eligible Recurring Costs	= \$814.32

One-Time Cost	
One-time Unit Cost	\$0.00
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$0.00
One-time Quantity	x 0
Total Eligible One-time Costs	= \$0.00
Summary	
Total Eligible Recurring Costs	\$814.32
Total Eligible One-time Costs	+ \$0.00
Pre-Discout Extended Eligible Line Item Cost	= \$814.32

Recipients of Services

BEN	Name
84054	NAVAJO HIGH SCHOOL
84055	NAVAJO ELEMENTARY SCHOOL
16021237	NAVAJO JUNIOR HIGH SCHOOL

FRN Calculation for FRN #1799055484

Monthly Charges	
Total Monthly Recurring Charges	\$67.86
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$67.86
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$814.32

One-Time Charges	
Total One-Time Charges	\$0.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$0.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$814.32
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$814.32
Discount Rate	10%
Funding Commitment Request	= \$81.43

Funding Request for FRN #1799055490

Funding Request Nickname: Cellular

Service Type: Voice

Agreement Information - Month-to-Month

Establishing FCC Form 470	170059377	Account Number	NA
Was an FCC Form 470 posted for the product and/or services you are requesting?	Yes	Service Provider	Verizon Wireless (Cellco Partnership) (SPN: 143000677)
How many bids were received for this contract?	3	When will the services end?	June 30, 2018
What is the service start date?	July 01, 2017		

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative 3 lines cellular services

Line Item # 1799055490.001

Product and Service Details

Function Voice

Type of Connection Cellular Voice with no Data and/or Text Messaging

Cost Calculation for FRN Line Item # 1799055490.001

Monthly Cost	
Monthly Recurring Unit Cost	\$14.66
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$14.66
Monthly Quantity	x 3
Total Monthly Eligible Recurring Costs	= \$43.98
Months of Service	x 12
Total Eligible Recurring Costs	= \$527.76

One-Time Cost	
One-time Unit Cost	\$0.00
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$0.00
One-time Quantity	x 0
Total Eligible One-time Costs	= \$0.00
Summary	
Total Eligible Recurring Costs	\$527.76
Total Eligible One-time Costs	+ \$0.00
Pre-Discout Extended Eligible Line Item Cost	= \$527.76

Recipients of Services

BEN	Name
84054	NAVAJO HIGH SCHOOL
84055	NAVAJO ELEMENTARY SCHOOL
16021237	NAVAJO JUNIOR HIGH SCHOOL

FRN Calculation for FRN #1799055490

Monthly Charges	
Total Monthly Recurring Charges	\$43.98
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$43.98
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$527.76

One-Time Charges	
Total One-Time Charges	\$0.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$0.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$527.76
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$527.76
Discount Rate	10%
Funding Commitment Request	= \$52.78

Funding Request for FRN #1799055501

Funding Request Nickname: 1GB IA

Service Type: Data Transmission and/or Internet Access

Agreement Information - Month-to-Month

Establishing FCC Form 470 170059377

Account Number NA

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes

Service Provider OneNet (Oklahoma State Regents) (SPN: 143015254)

How many bids were received for this contract? 1

When will the services end? June 30, 2018

What is the service start date? July 01, 2017

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative THERE IS A STATE MATCH OF FUNDS FOR THE SCHOOL NON-DISCOUNTED PORTION OF THE INSTALLATION FEE.

Line Item # 1799055501.001

Product and Service Details

Purpose Internet access service that includes a connection from any applicant site directly to the Internet Service Provider

Function Fiber

Type of Connection Ethernet

Bandwidth Speed

Upload Speed 1.0 Gbps **Download Speed** 1.0 Gbps

Connection Information

Does this include firewall services? No **Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a “Wide area network”)?** No

Is this a direct connection to a single school, library or a NIF for Internet access? Yes

Cost Calculation for FRN Line Item # 1799055501.001

Monthly Cost	
Monthly Recurring Unit Cost	\$4,519.00
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$4,519.00
Monthly Quantity	x 1
Total Monthly Eligible Recurring Costs	= \$4,519.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$54,228.00

One-Time Cost	
One-time Unit Cost	\$96,000.00
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$96,000.00
One-time Quantity	x 1
Total Eligible One-time Costs	= \$96,000.00
Summary	
Total Eligible Recurring Costs	\$54,228.00
Total Eligible One-time Costs	+ \$96,000.00
Pre-Discout Extended Eligible Line Item Cost	= \$150,228.00

Recipients of Services

BEN	Name
84054	NAVAJO HIGH SCHOOL
84055	NAVAJO ELEMENTARY SCHOOL
16021237	NAVAJO JUNIOR HIGH SCHOOL

FRN Calculation for FRN #1799055501

Monthly Charges	
Total Monthly Recurring Charges	\$4,519.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$4,519.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$54,228.00

One-Time Charges	
Total One-Time Charges	\$96,000.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$96,000.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$54,228.00
Total Eligible Pre-Discount One-Time Charges	+ \$96,000.00
Total Pre-Discount Charges	= \$150,228.00
Discount Rate	70%
Funding Commitment Request	= \$105,159.60

Funding Request for FRN #1799097297

Funding Request Nickname: Special Construction Costs

Service Type: Data Transmission and/or Internet Access

Fiber Request Key Information

Special Construction, Maintenance and Operations, or Network Equipment? Yes

Is this FRN supporting leased lit fiber, dark fiber or self-provisioned new or existing fiber? Lit Fiber

FRN Key Information for Special Construction

Total Project Plant Route Feet 26789 **Total Strands** 24

Average Cost per foot of outside plant \$3.55 **Number of E-rate Eligible Strands** 2

Is state or tribal match available for this FRN? Yes

State/Tribal Match Amount	Source of Matching Funds	Source of Matching Funds Documents
\$28,800.00	Oklahoma Universal Service Fund	

Does the FRN include an installment payment agreement for special construction charges? No

Does this installment agreement include a balloon payment? No

Agreement Information - Month-to-Month

Establishing FCC Form 470 170059377 **Account Number** NA

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes **Service Provider** OneNet (Oklahoma State Regents) (SPN: 143015254)

How many bids were received for this contract? 1 **When will the services end?** June 30, 2018

What is the service start date? July 01, 2017

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative Special construction charges for internet access

Line Item # 1799097297.001

Product and Service Details

Purpose

Function

Type of Connection

Bandwidth Speed

Upload Speed

Data connection(s) for an applicant’s hub site to an Internet Service Provider or state/ regional network where Internet access service is billed separately

Fiber

Lit Fiber (with Special Construction)

1.0 Gbps

1.0 Gbps

Connection Information

Does this include firewall services?

No

Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a “Wide area network”)?

No

Is this a direct connection to a single school, library or a NIF for Internet access?

No

Cost Calculation for FRN Line Item # 1799097297.001

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$0.00	One-time Unit Cost	\$95,000.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00	One-time Eligible Unit Cost	= \$95,000.00
Monthly Quantity	x 1	One-time Quantity	x 1
Total Monthly Eligible Recurring Costs	= \$0.00	Total Eligible One-time Costs	= \$95,000.00
Months of Service	x 12	Summary	
Total Eligible Recurring Costs	= \$0.00	Total Eligible Recurring Costs	\$0.00
		Total Eligible One-time Costs	+ \$95,000.00
		Pre-Discout Extended Eligible Line Item Cost	= \$95,000.00

Recipients of Services

BEN	Name
84054	NAVAJO HIGH SCHOOL
84055	NAVAJO ELEMENTARY SCHOOL
16021237	NAVAJO JUNIOR HIGH SCHOOL

FRN Calculation for FRN #1799097297

One-Time Charges	
Total One-Time Charges	\$95,000.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$95,000.00

Total Requested Amount	
Total Pre-Discount Charges	\$95,000.00
Special Construction State/Tribal Match Percentage	0%
Special Construction State/Tribal Match Discount Rate*	70%
Funding Commitment Request	= \$66,500.00

Funding Request for FRN #1799097967

Funding Request Nickname: 1 GB IA

Service Type: Data Transmission and/or Internet Access

Agreement Information - Month-to-Month

Establishing FCC Form 470 170059377

Account Number NA

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes

Service Provider OneNet (Oklahoma State Regents) (SPN: 143015254)

How many bids were received for this contract? 1

When will the services end? June 30, 2018

What is the service start date? July 01, 2017

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative IA

Line Item # 1799097967.001

Product and Service Details

Purpose		Internet access service that includes a connection from any applicant site directly to the Internet Service Provider	
Function	Fiber		
Type of Connection	Ethernet		
Bandwidth Speed			
Upload Speed	1.0 Gbps	Download Speed	1.0 Gbps

Connection Information

Does this include firewall services?	No	Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a “Wide area network”)?	No
Is this a direct connection to a single school, library or a NIF for Internet access?	Yes		

Cost Calculation for FRN Line Item # 1799097967.001

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$4,430.00	One-time Unit Cost	\$1,000.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$4,430.00	One-time Eligible Unit Cost	= \$1,000.00
Monthly Quantity	x 1	One-time Quantity	x 1
Total Monthly Eligible Recurring Costs	= \$4,430.00	Total Eligible One-time Costs	= \$1,000.00
Months of Service	x 12	Summary	
Total Eligible Recurring Costs	= \$53,160.00	Total Eligible Recurring Costs	\$53,160.00
		Total Eligible One-time Costs	+ \$1,000.00
		Pre-Discout Extended Eligible Line Item Cost	= \$54,160.00

Recipients of Services

BEN	Name
84054	NAVAJO HIGH SCHOOL
84055	NAVAJO ELEMENTARY SCHOOL
16021237	NAVAJO JUNIOR HIGH SCHOOL

FRN Calculation for FRN #1799097967

Monthly Charges	
Total Monthly Recurring Charges	\$4,430.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$4,430.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$53,160.00

One-Time Charges	
Total One-Time Charges	\$1,000.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$1,000.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$53,160.00
Total Eligible Pre-Discount One-Time Charges	+ \$1,000.00
Total Pre-Discount Charges	= \$54,160.00
Discount Rate	70%
Funding Commitment Request	= \$37,912.00

Connectivity Questions

District/System-wide Internet Access Questions

Does your school district currently aggregate Internet access for the entire district(as opposed to buying Internet access on a building-by-building basis)? Yes

Download Speed	200.00	Download Speed Units	Mbps
Upload Speed	200.00	Upload Speed Units	Mbps

Per Entity Basis Questions

Entity Name NAVAJO INDEP SCHOOL DISTRICT 1 Entity Number 139880

BEN	Entity Name	Download	Units	Upload	Units	Connection	Wifi Sufficient	Barriers to Robust Network
84054	NAVAJO HIGH SCHOOL	200.00	Mbps	200.00	Mbps	Fixed Wireless	Sometimes	Equipment too costly
84055	NAVAJO ELEMENTARY SCHOOL	200.00	Mbps	200.00	Mbps	Fixed Wireless	Sometimes	Equipment too costly
16021237	NAVAJO JUNIOR HIGH SCHOOL	200.00	Mbps	200.00	Mbps	Fixed Wireless	Sometimes	Equipment too costly

Certifications

I certify that the entities listed in this application are eligible for support because they are schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million.

I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

Total Funding Summary

Below is a summary of the total line item costs on this FCC Form 471:

Summary	
Total funding year pre-discount eligible amount on this FCC Form 471	\$337,666.32
Total funding commitment request amount on this FCC Form 471	\$232,616.23
Total applicant non-discount share of the eligible amount	\$105,050.09
Total budgeted amount allocated to resources not eligible for E-rate support	\$40,000.00
Total amount necessary for the applicant to pay the non-discount share of eligible and any ineligible amounts	\$145,050.09
Are you receiving any of the funds directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year?	No
Has a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds needed to pay your non-discounted share?	No

I certify an FCC Form 470 was posted and that any related RFP was made available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology goals. I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them. I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. § 54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, as prohibited by

the Commission's rules at 47 C.F.R. § 54.503(d), other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

I certify that I and the entity(ies) I represent have complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification) after the later of the last day of the applicable funding year or the service delivery deadline for the associated funding request. I acknowledge that I may be audited pursuant to participation in the schools and libraries program. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to USAC.

I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

I certify that if any of the Funding Requests on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504.

Notice

Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to submit an application for such discounts by filing this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the application requirements for universal service discounts contained in 47 C.F.R. § 54.504. Schools and libraries must file this form themselves or as part of a consortium. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving your application for universal service discounts is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application for universal service discounts may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public. If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized. If you do not provide the information we request on the form, the FCC or the Universal Service Administrator may delay processing of your application for universal service discounts or may return your application without action. The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq. Public reporting burden for this collection of information is estimated to average 4.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554. We also will accept your comments via the email if you send them to PRA@FCC.gov. DO NOT SEND COMPLETED WORKSHEETS TO THESE ADDRESSES.

Authorized Person

Title:	Consultant	Name:	Kimberly Phillips
Phone:	918-445-0048	Email:	kimberly@crwconsulting.com
Address:	CRW Consulting PO Box 701713 Tulsa OK 74170 - 1713	Employer:	Kimberly Phillips

Certified Timestamp

11-May-2017 11:27:34 EDT

Exhibit 2



MTM – INTERNET ACCESS

(Month-to-month service -- no contract needed)

E-Rate Funding Year 2017

SPIN 143015254

FCC RN 0025174095

Proposal Contingent upon E-Rate Funding

Navajo Public School

15695 S County Rd 210

Altus OK 73521

Type of Service Requested	Type of Connection	Purpose	Number of Lines	Bandwidth Upload/Download Speed (Mbps): Non-burstable	Firewall Included ?(Y/N)	Last Mile Connection ?(Y/N)	WAN ?(Y/N)	Monthly Recurring Cost	Annual Recurring Cost
Internet access service	Ethernet over lit fiber	Internet	1	200	No	No	No	\$ 2,580	\$ 30,960
Establishment fee (One-time cost): \$ 0									
Construction fee (Onetime cost): \$									
Internet access service	Ethernet over lit fiber	Internet	1	500	No	No	No	\$ 3,760	\$ 45,120
Establishment fee (One-time cost): \$ 1,000									
Construction fee (Onetime cost): \$ 95,000									
Internet access service	Ethernet over lit fiber	Internet	1	750	No	No	No	\$ 4,110	\$ 49,320
Establishment fee (One-time cost): \$ 1,000									
Construction fee (Onetime cost): \$ 95,000									
Internet access service	Ethernet over lit fiber	Internet	1	1000	No	No	No	\$ 4,430	\$ 53,160
Establishment fee (One-time cost): \$ 1,000									
Construction fee (Onetime cost): \$ 95,000									
Internet access service	Ethernet over lit fiber	Internet	1	2500	No	No	No	\$ 7,430	\$ 89,160
Establishment fee (One-time cost): \$ 1,000									
Construction fee (Onetime cost): \$ 49,500									

OneNet service provides the connection from your location to our hub site. As part of our standard package, OneNet service customers receive: quality of service, MPLS, DNS, unlimited video conferencing and related technical support. OneNet operates under a cost-recovery model. The internet access rate quoted is based on cost to provide internet access only. There are no costs associated with quality of service, MPLS, DNS, and video conferencing.

- Construction costs shown are charges necessary to provide service to an applicant (customer) demarc.

- Applicant (customer) is responsible for all site preparations such as electrical capacity and backboard for mounting service provider equipment if applicable.

Customer Provided Router

- >100M will require a router with 2 Gigabit Ethernet interfaces: one for Internet and one for LAN
- >1Gig will require a router with 2 (10 Gigabit) interfaces: one for Internet and one for LAN

Options

- OneNet Provided Router (E-rate Category One on premise equipment)
 - BW: T1 – 450M = SRX240 (\$89/month for Juniper SRX240 or current functionally equivalent model)
 - BW: 500M – 1500M = SRX550 (\$89/month for Juniper SRX550 or current functionally equivalent model)
 - BW: 1500M – 5Gig = SRX1500 (\$2,000/month for Juniper SRX1500 or current functionally equivalent model)

The router shall remain the property of OneNet. Maintenance of router will be OneNet's responsibility. Customer's local network will not be dependent on the OneNet provided router.

- Content Filtering (not E-rate eligible service)
 - Schools with 500 students or less: \$600 annually. Schools with more than 500 students: \$1.30 per student (e.g. 1000 students x \$1.30 = \$1,300 annually)
- Email (no longer E-rate eligible)
 - Unlimited email users \$250 annually for internet access customers/ \$300 annually for non-internet access customers.
- Web Hosting (no longer E-rate eligible)
 - \$50 annually for internet access customers/ \$100 annually for non-internet access customers.
- Multi-Year Options
 - Initial one-year agreement with up to four (4) voluntary renewals, subject to annual ratification by customer and OneNet. If mutual ratification is not agreed upon, services will continue on a month-to-month basis until services are cancelled.

Prepared by:



Ami Layman

Assistant Director of Administration

PO Box 108800

Oklahoma City, OK 73101-8800

(888) 566-3638

Authorized by:

Authorized Signature

Date